



PETROLEUM PRODUCTS

PRODUCING DEPARTMENT
LOS ANGELES DIVISIONG. F. CLARKE
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U.S.A.A DIVISION OF TEXACO INC.
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LOS ANGELES, CA 90010

June 2, 1982

Environmental Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

Attention: Mr. Nathan Lau
Water Management Division

Dear Mr. Lau:

Texaco supports the California Department of Conservation, Division of Oil and Gas Application for Primacy to Regulate Underground Injection Wells related to the recovery and production of oil and gas under Section 1425 of the Safe Water Drinking Act. The California Division of Oil and Gas has regulated underground injection as it relates to the recovery and production of oil and gas (EPA Class II Injection Wells) since 1945.

The California Division of Oil and Gas (CDOG) has established comprehensive rules and operating procedures to ensure that injected fluids are confined to the intended zone of injection and were segregated from all freshwater aquifers. This program has been very successful in preventing freshwater degradation. The CDOG's permitting and monitoring procedures have proven to be an effective and efficient means of assuring water quality protection.

In view of this existing successful program, Texaco is of the opinion that the current CDOG rules and regulations are both effective in protecting California's freshwaters and cost effective to the public.

If the California Division of Oil and Gas is required to switch over to an entirely new set of regulations, it would result in an unnecessary regulatory and financial burden to both the California State Government and industry.

Yours very truly,

G. F. CLARKE

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